

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

JEROME BLIGE,)
MARSHELL BERNICE LEE,)
and the ESTATE OF SAUDI)
ARAI LEE, by and through)
MARSHELL BERNICE LEE, its)
Administrator,)
)
VERSUS) CIVIL ACTION NO.: 4:24-cv-00131-RSB-CLR
)
ERNEST FERGUSON,) JURY TRIAL DEMANDED
IN HIS INDIVIDUAL CAPACITY;)
MACKENZIE RANDLE, IN HIS)
INDIVIDUAL CAPACITY;)
CITY OF SAVANNAH)

EXHIBIT 1

David Utter

From: Taylor Dove <tdove@huntermaclean.com>
Sent: Thursday, April 10, 2025 3:47 PM
To: David Utter; Anthony Poulos; Lovett Bates; Pat O'Connor; Malcolm Mackenzie
Cc: Will Claiborne
Subject: RE: Jerome Blige et al., v. Ernest Ferguson, et. al.

David,

The City does intend on filing another MTD and will not oppose a motion to stay filed by Plaintiffs. I think it makes sense to go ahead and postpone next week's depos.

Taylor Dove

Partner

HunterMaclean

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P.O. Box 9848 | Savannah, GA 31412-0048
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From: David Utter <david@claibornefirm.com>
Sent: Thursday, April 10, 2025 3:44 PM
To: Gracie Shepherd Saas <gsaas@huntermaclean.com>; Anthony Poulos <apoulos@olivermaner.com>; Lovett Bates <BLovett@savannahga.gov>; Pat O'Connor <pto@olivermaner.com>; Taylor Dove <tdove@huntermaclean.com>; Malcolm Mackenzie <MMackenzie@wswgs.com>
Cc: Will Claiborne <will@claibornefirm.com>
Subject: FW: Jerome Blige et al., v. Ernest Ferguson, et. al.

Counsel,

See below re: Plaintiffs' missive to the city yesterday. I've not heard back and assume we are proceeding with the depositions as scheduled next week. Will and I think a stay makes sense if the City files another MTD. Do folks agree or does the defense want to proceed with next week's depos?

David

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From: David Utter
Sent: Wednesday, April 9, 2025 2:30 PM
To: Taylor Dove <tdove@huntermaclean.com>; Bates Lovett <BLovett@Savannahga.Gov>
Cc: Will Claiborne <will@claibornefirm.com>; Kim Griffin <Kim@claibornefirm.com>
Subject: Jerome Blige et al., v. Ernest Ferguson, et. al.

Taylor and Bates,

Is the City planning on filing a motion to dismiss Plaintiffs' 2nd Amended Complaint? If so, will you consent to a stay of discovery until the motion is decided?

Let me know soon given the pending depositions set for next week.

Many thanks,

David

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Thank You.
Hunter, Maclean, Exley & Dunn, P.C.
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